



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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*271 Cadman Plaza East  
Brooklyn, New York 11201*

February 15, 2023

***VIA ECF***

Honorable \_\_\_\_\_  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Travis v. Isabella Casillas Guzman, Administrator, SBA*  
Case No.: 23-CV-1050

Your Honor<sup>1</sup>:

This Office writes on behalf of Defendant Isabella Casillas Guzman, Administrator, United States Small Business Administrator ("SBA") in the above-referenced matter, to request an extension of time from February 15, 2023 to April 17, 2023 to respond to the Complaint. This is Defendant's first request for an extension of time. Plaintiff consents to this request.

By way of background, Plaintiff *pro se* Svetlana Travis alleges that she applied for a loan from the Small Business Administration ("SBA"), pursuant to the Coronavirus Aid, Relief, and Economic Security ("CARES") Act and the SBA's denial of Plaintiff Travis's request. *See* Dkt. No. 1, Compl., ¶ 1. Plaintiff also alleges that SBA approved her application for a grant, but when her bank declined to accept the proceeds, SBA denied Plaintiff's request to deposit the funds in a different account. *Id.* While Plaintiff *pro se* requests a writ of mandamus, directing federal entity SBA to deposit her grant money in the bank account of her choice and to grant her loan application, Defendant liberally construes the complaint as a request for review under both the Mandamus Act, 28 U.S.C. § 1361, and the Administrative Procedure Act. 5 U.S.C. § 706(2).

Plaintiff commenced this action in New York City Civil Court, Kings County on December 14, 2022. Neither this Office, nor SBA was served with the complaint in this case.

On February 15, 2023 the undersigned removed this matter to this Court, pursuant to 28 U.S.C. § 1442(a)(1). The undersigned requests the extension of time from February 15, 2023 to

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<sup>1</sup> A response to the Complaint is due today, but as of the filing of this document, no District Judge or Magistrate Judge has been assigned to this matter.

April 17, 2023 so that the government can complete its investigation of Plaintiff's claim and answer, move or otherwise respond to Plaintiff's allegations.

Defendant thanks the Court for considering this request.

Respectfully submitted,

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